

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6 1201 ELM STREET, SUITE 500 DALLAS, TEXAS 75270

Office of the Regional Administrator

April 28, 2021

Mr. Hugh P. Lambert, Esq. The Lambert Firm 701 Magazine Street New Orleans, Louisiana 70130

Dear Mr. Lambert:

Thank you for your April 8, 2021 letter to EPA Region 6 regarding EPA's chloroprene air monitoring adjacent to the Denka Performance Elastomer, LLC (DPE) facility in LaPlace, Louisiana.

We have announced our plan to extend the duration of the continuous monitoring program around the facility. Our continuous monitoring program is providing valuable information regarding chloroprene emissions from the facility. Over the past several months, EPA has identified twelve incidents where elevated levels of chloroprene were detected by the continuous monitors surrounding the plant. EPA has issued a Section 114 information request under the Clean Air Act for the company to provide operational information related to those elevated chloroprene levels for Agency review and analysis. The information will allow EPA to evaluate compliance with air permit requirements at the facility, and may provide information about the measures that DPE may be able to take to decrease the likelihood of future spikes and further reduce concentrations of chloroprene in the community.

We appreciate the feedback you have provided in your letter regarding EPA's ongoing continuous monitoring program around DPE's facility. Please keep in mind that in the ongoing continuous monitoring program, EPA manually triggers the monitors every seventh day to collect samples as an instrument quality check, if the monitors have not been triggered by detecting volatile organic compound (VOC) emissions. This is needed as periods of greater than seven days without a sample collected could indicate monitoring system maintenance. This helps ensure our confidence in our current monitoring program. In addition, we continue to evaluate the data being generated by DPE's air monitoring network. DPE's monitors continue to show ambient concentrations that are comparable to data from EPA's community monitoring before we transitioned to the continuous monitoring approach that we are currently using.

Once again, thank you for your shared interest in addressing the chloroprene emissions and EPA's ongoing work to monitor chloroprene emissions in the community of LaPlace. EPA will continue to evaluate its on-going monitoring efforts and make changes as needed to support our efforts to identify

potential additional opportunities to reduce chloroprene emissions. We will continue to provide updates to state and local officials about our ongoing monitoring and any changes we make in the future.

Sincerely,

David W. Gray

Acting Regional Administrator

cc: Jennifer Orme-Zavaleta, U.S. EPA Office of Research and Development
Vaughn Noga, U.S. EPA Office of Environmental Information
Kris Thayer, U.S. EPA Office of Research and Development
John Vandenberg, U.S. EPA Office of Research and Development
Louis D' Amico, U.S. EPA Office of Research and Development
Erika Sasser, U.S. EPA Office of Air and Radiation
Providence Spina, U.S. EPA Office of Enforcement and Compliance Assurance
Tracy Sheppard, U.S. EPA Office of General Counsel
Kelly Rimer, U.S. EPA Office of Air and Radiation
Dr. Chuck Carr Brown, Louisiana Department of Environmental Quality
Jaclyn Hotard, St. John the Baptist Parish President
Robert Holden, Counsel for Denka Performance Elastomer LLC